

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT  
EASTERN DISTRICT WI  
FILED

UNITED STATES OF AMERICA,

2019 APR 25 A 11:17 CV

Plaintiff,

Case No. 19-CR-STEPHEN C. DRIES

v.

XENGXAI NMI YANG,

19-CR-67 CLERK

Defendant.

Green Bay Division

[18 U.S.C. §§ 2113(a) and (d) and  
924(c)(1)(A)(ii) and (B)(i); 26  
U.S.C. §§ 5841, 5845(a), 5861(d),  
and 5871]

---

INDICTMENT

---

COUNT ONE

THE GRAND JURY CHARGES THAT:

On or about March 15, 2019, in the State and Eastern District of Wisconsin,

**XENGXAI NMI YANG**

knowingly took, by force, violence, and intimidation, from the person and presence of others, United States currency, belonging to, and in the care, custody, control, management, and possession of Community First Credit Union, 1235 West Spencer Street, Appleton, Wisconsin, the deposits of which were then insured by the National Credit Union Administration, and in committing this offense put in jeopardy the lives of other persons by use of a dangerous weapon, to wit: a firearm.

In violation of Title 18, United States Code, Sections 2113(a) and (d).

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about March 15, 2019, in the State and Eastern District of Wisconsin,

**XENGXAI NMI YANG**

knowingly carried, used, and brandished a firearm during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, that is, Count One of this Indictment.

2. The firearm is more fully described as a Savage Model 64 .22 rifle with obliterated serial number, modified through a cut-off barrel.

3. The rifle as modified had a barrel of less than 16 inches in length.

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and (B)(i).

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. On or about March 15, 2019, in the State and Eastern District of Wisconsin,

**XENGXAI NMI YANG**

knowingly possessed a firearm, which was not registered to him in the National Firearms Registration and Transfer Record.

2. The firearm is more specifically described as a Savage Model 64 .22 rifle with obliterated serial number, modified through a cut-off barrel.

3. The rifle as modified has a barrel of less than 16 inches in length.

All in violation of Title 26, United States Code, Sections 5841, 5845(a), 5861(d), and 5871.

A TRUE BILL:

\_\_\_\_\_  
FOREPERSON

Dated: 4/16/19

f/r Kelly B. Willey/MS  
MATTHEW D. KRUEGER  
United States Attorney